

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA19cw3066
JRT/ECWLatocha Thomas, Devon McClean,
Plaintiff,

-vs-

Todd Axtell (Individual and Official Capacity),
Ramsey County Medical Examiner (Individual and Official
Capacity),
Saint Paul Police Department Gang Unit Sgt. (Individual
and Official Capacity),
SPPD Gang Unit High Ofc. (Individual and Official Capacity),
SPPD Gang Unit John Doe's (Individual and Official Capacity),
Ramsey County Minnesota, State of Minnesota,
Bob Fletcher (Individual and Official Capacity) et al.,
Defendants.RECEIVED
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DEC 11 2019

CLERK
U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTACivil Rights Suit 42 U.S.C § 1983
Legal Malpractice Suit
Wrongful Death Suit
Jury Trial Demand

CLAIMS

1.) In Ramsey County, Minnesota on or about 01/15/19 my son was murdered due to; Todd Axtells, SPPD Gang Unit High Officer, Gang Unit SPPD John Doe's, Bob Fletcher, SPPD Gang Unit Sgt., Ramsey County Minnesota, Minnesota, lack of policing by recklessly disregarding issues plaguing the city of Saint Paul and occupants thereof by showing a deliberate indifference towards

detering gang acts before they occur causing a failure to protect my son Devon Lamont McIllean resulting in a predeprivation that ultimately led to his death.

The actions of the relevant defendants violated my sons right to due process of law @ the United States Constitution, accessible @ that instruments 5th and 14th Amendments. The actions of the defendants resulted in wrongful death and legal malpractice.

Plaintiff suffered mentally, emotionally, spiritually, physically, and financially amongst others.

Plaintiff prays for monetary relief in excess of 50,000 U.S. dollars, @ approx. 21,000,000 U.S. dollars.

Plaintiff prays for injunctive, punitive, nominal and declaratory relief.

2.) In Ramsey County, Minnesota in the year of 2019 Month of February SPPD Gang Unit Sgt., informed me that my sons body would not be released for burial or cremation until the SPPD completed its investigation. SPPD recklessly disregarded my families interest in processing my sons body.

Defendants SPPD Gang Unit Sgt., Todd Axtell, Ramsey County Minnesota, Minnesota, Ramsey County Medical Examiner are liable for infringing upon me my families and my sons right to; Family integrity, First and Fourteenth Amendments to the

United States Constitution, Due Process, Minnesota legal malpractice and wrongful death doctrines as well as federal doctrines of malpractice and wrongful death.

Plaintiffs suffered mentally, emotionally, spiritually, physically and financially amongst others.

Plaintiffs pray for nominal, injunctive, declaratory, punitive and monetary relief. Monetary relief in the amount of 27,000,000 U.S. dollars requested.

Graciously,

/s/

Dated:

Signed under the penalty of perjury

L
1604 16th St. Apt. #3
Des Moines IA